

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION, MARY WINTER, GENE  
STEINBERG, NANCY HART, SARAH  
WOLFF, KAREN SLAVEN, KATE KENNEDY,  
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its  
attorney general, LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.  
BURKMAN & ASSOCIATES, LLC, PROJECT  
1599, and JOHN and JANE DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

**DECLARATION OF AMY WALSH IN SUPPORT OF PLAINTIFFS' MOTIONS *IN  
LIMINE***

Amy Walsh, an attorney duly admitted to practice law in the State of New York and the U.S. District Court for the Southern District of New York, hereby declares pursuant to 28 U.S.C. § 1746 and under penalty of perjury:

1. I am a partner with the law firm of Orrick, Herrington & Sutcliffe LLP and counsel for the National Coalition on Black Civic Participation and the individual Plaintiffs in this case.
2. I submit this declaration in support of all Plaintiffs' Motions *in Limine*. I have personal knowledge of the facts stated here, and each of them is true and correct

3. Attached as **Exhibit A** is a copy of excerpts from the transcript of the May 9, 2022 deposition of Gene Steinberg.

4. Attached as **Exhibit B** is a copy of excerpts from the transcript of the April 8, 2022 deposition of Kate Kennedy.

5. Attached as **Exhibit C** is a copy of excerpts from the transcript of the April 8, 2022 deposition of Karen Slaven.

6. Attached as **Exhibit D** is a copy of excerpts from the transcript of the April 10, 2022 deposition of Nancy Hart.

7. Attached as **Exhibit E** is a copy of excerpts from the transcript of the April 9, 2022 deposition of Eda Daniel.

8. Attached as **Exhibit F** is a copy of excerpts from the transcript of the May 2, 2022 deposition of Sarah Wolff.

9. Attached as **Exhibit G** is a copy of excerpts from the transcript of the April 19, 2022 deposition of Andrea Sferes.

10. Attached as **Exhibit H** is a copy of excerpts from the transcript of the May 9, 2022 deposition of Mary Winter.

11. Attached as **Exhibit I** is a copy of the Court-ordered robocall, Exhibit C to the April 8, 2022 deposition of Karen Slaven (submitted to the Court in physical form).

12. Pursuant to Judge Marrero's Individual Practices Section II.E, I attest that I am familiar with the full contents of the documents attached to this declaration, that I will maintain a copy of the entire documents in my case files until after a final court disposition of the action, and that the excerpts of documents filed with these motion papers are authentic copies of the relevant portions of the documents.

WHEREFORE, I respectfully request that the Court grant the relief sought in the Notices of Motion and grant such other and further relief as the Court deems just and proper.

Dated: June 22, 2023  
New York, New York

*s/Amy Walsh*

Amy Walsh